

## **REMARKS**

In response to the Office Action mailed October 17, 2007, the Applicants sincerely request reconsideration in view of the above claim amendments and the following remarks.

Claims 1-30 are currently pending in the application and stand rejected. In response, claims 1, 4, 6, 7, 8, 9, 11, 12, 13, 14, 17, 18, 19, 20, 23, 25, 26, 27, 28, 29, and 30 have been amended and claims 2-3, 5, 15, 21-22, and 24 have been canceled without prejudice or disclaimer. The claims have been amended to specify determining that a child element represented on the first data structure is a baby element when a parent element of the child element is being added to the first data structure, removing from the baby element from the first data structure to minimize the number of elements in the first data structure, and wherein the internal arrangement functions comprise computing a final size for a child element and utilizing the computed size to set a location for displaying the child element, wherein the location is stored as a coordinate of a geometric shape representing the child element. Support for these amendments may be found in at least paragraphs 0079 and 0098 in the Specification. No new matter is added.

### ***Claim Rejections – 35 U.S.C. § 102***

Claims 1-30 stand rejected under 35 U.S.C. 102(b) as being anticipated by Hogan, et al. (US 5,414,809, hereinafter “Hogan”). Claims 2-3, 5, 15, 21-22, and 24 have been canceled without prejudice or disclaimer rendering the rejection of these claims moot. The rejection of the remaining claims is respectfully traversed.

Amended Claim 1 recites a method for managing the preparation of a set of graphical elements for presentation. The method includes identifying a first subset of the elements where measurement is desirable, wherein each element in the first subset has associated with it a respective island of elements and wherein identifying the first subset comprises using a first data structure to represent the first subset of the elements; identifying a second subset of the elements where arrangement is desirable, wherein each element in the second subset has associated with it a respective island of elements and wherein identifying the second subset comprises using a second data structure to represent the second subset of the elements; executing a first series of operations for measuring the elements comprising the first subset, wherein an operation of the first series of operations includes, determining whether each element in the first subset has any

children and computing a size for any elements in the first subset having children, wherein the first series of operations further comprises: a) identifying a maximal element represented in the first data structure; b) removing the maximal element's representation in the first data structure; c) measuring the maximal element; d) determining that a child element represented on the first data structure is a baby element when a parent element of the child element is being added to the first data structure; e) removing from the baby element from the first data structure to minimize the number of elements in the first data structure; and repeating the listed steps until the first data structure is empty; and executing a second series of operations for arranging the elements comprising the second subset.

Hogan discusses a method of using a computer to implement a graphical interface having a single view style for a single type of graph. See Hogan column 1, lines 34-36. Hogan discusses that the primary concern of a view style is determining the size and position of graphical objects and typically, this determination is on the basis of a data field of a data record associated with the graphical object. See Hogan column 4, lines 22-30. Hogan discusses that all visible nodes represent actual data items, and connections between nodes represent the parent/child relationship between the data items. See Hogan column 53 line 67 through column 54 lines 2.

It is respectfully submitted that Hogan fails to teach all of the features recited in amended claim 1. For example, Hogan fails to disclose determining that a child element represented on the first data structure is a baby element when a parent element of the child element is being added to the first data structure and removing from the baby element from the first data structure to minimize the number of elements in the first data structure. In contrast, Hogan discusses that connections between nodes represent a parent/child relationship between data items. Hogan also discusses network filtering and special facilities for specifying separate arc and node filters, and for determining whether or not to display unconnected graphic objects (“orphans”). See column 64, lines 28-34. Thus, while Hogan discusses parent/child relationships and determining whether or not to display unconnected objects or orphans, Hogan fails to disclose baby elements which are determined when a parent element is being added to a data structure which already represents a child element of the parent element being added. As a result, the baby element is removed from the data structure to minimize the number of elements in the data structure. In contrast to Hogan, a baby element is not an orphan as it has a connection with its parent element and is

substituted in the data structure by its parent, thereby minimizing the total number of elements. Hogan fails to teach the substitution of a parent element in favor of its child to minimize graphical elements. Therefore, amended claim 1 is allowable and the rejection of this claim should be withdrawn.

Dependent claims 4, 6, 7, 8, 9, 11, 12, and 13 are also allowable at least for the reasons described above regarding independent claim 1, and by virtue of their dependency upon independent claim 1. Accordingly, Applicants respectfully request withdrawal of the rejection of these claims. Amended independent claims 14 and 20 recite similar features as those recited in amended claim 1 and thus are allowable over Hogan for at least the same reasons. In addition, amended claim 20 further specifies that the internal arrangement functions comprise computing a final size for a child element and utilizing the computed size to set a location for displaying the child element, wherein the location is stored as a coordinate of a geometric shape representing the child element. It is respectfully submitted that Hogan also fails teach this additional feature. In contrast, Hogan determines the size and position of graphical objects based on a data field of a data record associated with the graphical object and not child elements. See Hogan column 4, lines 22-30. Furthermore, Hogan is silent with respect to storing the location for displaying a child element as a coordinate of a geometric shape representing that child element. Instead, Hogan is merely directed to implementing a graphical interface having a single view style for a single type of graph, not identifying, measuring and arranging sets of elements for presentation. Therefore, amended claim 20 is also allowable for at least these additional reasons. Accordingly, independent claims 14 and 20 patentably distinguish the present invention over the cited art, and Applicants respectfully request withdrawal of the rejection of these claims. Dependent claims 16, 17, 18, 19, 20, 23, 25, 26, 27, 28, 29, and 30 are also allowable at least for the reasons described above regarding independent claims 14 and 20 and by virtue of their dependency upon the aforementioned claims. Accordingly, Applicants respectfully request withdrawal of the rejection of these claims.

## **CONCLUSION**

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,  
MERCHANT & GOULD, P.C.

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